

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Classification and Fees for Weight-Averaged)	Docket No. MC99-2
Nonletter-Size Business Reply Mail, 1999)	

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS TIMOTHY D. ELLARD
(OCA/USPS-T2-1-11)
April 22, 1999

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses to these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets,

charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such printouts, microfilms, cards, discs, tapes or other recordings.

"All documents" means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"Communications" includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is

possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

OFFICE OF THE CONSUMER ADVOCATE

Ted P. Gerarden
Director

Kenneth E. Richardson
Attorney

OCA/USPS-T2-1. Your testimony generally discusses the process for determining “prospects” who might be in a position to take advantage of the proposed fees and you state at page 8 of your testimony that the results of the study determined ten respondents “representing 11 sites and a total of 15.8 million pieces of mail annually said they expected to take advantage of the proposed fees.” Among the five industries represented by the respondents are the film processing industry.

- a. Please indicate whether any of the four film processors taking part in the experiment in Docket No. MC99-1 are among the respondents referenced in your testimony? If so, which of those film processors are included?
- b. If your answer to the first part of a, above, is yes:
 1. Please indicate whether, in calculating the 15.8 million pieces of mail annually, you used the same annual volumes utilized by witness Schenk in her workpapers for three of the film processors?
 2. If you did not use the same annual volumes as witness Schenk, please compare your annual volumes with her annual volumes, and indicate whether the annual volume of mail which you assume for those film processors is higher or lower and provide the total percentage difference between your estimates and witness Schenk’s estimates.
 3. If you did not use the same annual volumes as witness Schenk, please indicate the source or sources of your estimate for the film processors.

OCA/USPS-T2-2. Are any of the eleven sites represented by the ten respondents the same sites currently utilized for processing weight-averaged nonletter-size business reply mail?

OCA/USPS-T2-3. Do any respondents, other than one film processor currently using two sites, expect to utilize more than one site for processing weight-averaged mail?

OCA/USPS-T2-4. Please indicate how many of the ten respondents are represented in each of the five industries which you list on page 8 of your testimony.

OCA/USPS-T2-5. Please refer to page 8 of your testimony and provide the explanations given by each of the eleven of twenty-one respondents who completed the process as to why they do not expect to take advantage of the proposed fees.

OCA/USPS-T2-6. In your opinion, based upon your experience, how many of the eleven of the twenty-one respondents, who completed the process and who indicated they do not expect to take advantage of the proposed fees, will decide to use the proposed fees in approximately the next two years?

OCA/USPS-T2-7. In your opinion, based upon your experience, how many of the ten of the twenty-one respondents, who completed the process and who indicated they expect to take advantage of the proposed fees, will decide not to use the proposed fees in approximately the next two years?

OCA/USPS-T2-8. How many of the ten respondents who indicated they expected to use the proposed fees have annual volumes:

- a. Above 75,000 qualifying pieces?
- b. Above 100,000 qualifying pieces?
- c. Above 150,000 qualifying pieces?

OCA/USPS-T2-9. The proposed fee structure and the worksheets included with your testimony as USPS-2C, pages 2, and on the worksheet on page 6, indicate a lowest proposed monthly fee of \$1000 (with a one-half cent per piece charge) although a \$600 monthly fee is proposed in this docket by the Postal Service. Would the lower monthly fee now being proposed have any impact on your study results? If so, what do you believe the impact would be?

OCA/USPS-T2-10. Have the ten respondents who stated they expect to take advantage of proposed fees indicated their current plans in view of the rates proposed in this docket? If so, what are they?

OCA/USPS-T2-11. What are the most recent dates on which each of the ten respondents said they expect to take advantage of the proposed fees?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
April 22, 1999